

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Hea THAI (A027 342 707),)	
)	
Petitioner,)	Case No.
)	
v.)	PETITION FOR WRIT OF
)	HABEAS CORPUS
)	
PATRICIA HYDE, Field Office Director,)	
MICHAEL KROL, HSI New England Special)	
Agent in Charge, and TODD LYONS, Acting)	
Director U.S. Immigrations and Customs)	
Enforcement, and KRISTI NOEM, U.S. Secretary)	
of Homeland Security, DEPARTMENT OF)	
HOMELAND SECURITY,)	
)	
Respondents.)	
)	

INTRODUCTION

1. Petitioner Hea Thai is a fifty-four-year-old native of Cambodia who has been diligently complying with an Order of Supervision since July 9, 2012. He has never had the opportunity to seek fear-based protection from removal to Cambodia, and is a long-standing essential employee of Roca, an organization that supports and intervenes with high risk youth in collaboration with local law enforcement. On information and belief, He was unlawfully detained by federal immigration agents on or about May 24, 2025.
2. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner asks this Court to find that he was unlawfully detained and order his release.

JURISDICTION

4. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).
5. Venue is proper because Petitioner resides in Lynn, MA and on information and belief is detained in the District of Massachusetts.

PARTIES AND FACTS ALLEGED

6. The Petitioner, Hea Thai, is a senior youth worker at Roca, Inc. Since 2013, he has worked tirelessly in this position with high-risk young men in the Lynn-area community, providing them support for housing, medical treatment, education, employment, and other pathways to stability. He works in close collaboration with the courts, probation, and the police to identify and intervene with young men in need. He currently resides in Lynn, Massachusetts, with his U.S. citizen daughter, elderly mother, sister, niece and nephew, to whom he provides care and support. He has Type 2 Diabetes as well as other health conditions that require medication, close monitoring, and specialized diet.
7. Respondent Patricia Hyde is the New England Field Office Director for U.S. Immigration and Customs Enforcement.
8. Respondent Michael Krol is the New England Special Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement.
9. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs Enforcement.
10. Respondent Kristi Noem is the U.S. Secretary of Homeland Security;
11. Respondent Department of Homeland Security is the executive agency charged with

overseeing all immigration laws and policies.

12. All respondents are named in their official capacities.

13. Petitioner is a native of Cambodia. On information and belief, he was detained without cause by U.S. Immigration and Customs Enforcement agents while driving to pick up his nephew in Lynn, MA.

14. On information and belief, Petitioner is currently in custody in the District of Massachusetts, and one or more of the Respondents is his immediate custodian.

CLAIMS FOR RELIEF

COUNT ONE

Violation of Fifth Amendment Right to Due Process

1. On information and belief, Petitioner is currently being arrested and detained by federal agents without cause and in violation of his constitutional rights to due process of law.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Massachusetts;
- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.
- (4) Declare that the Petitioner's detention violates the Due Process Clause of the Fifth Amendment.
- (5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.
- (6) Grant any further relief this Court deems just and proper.

Respectfully submitted,
On behalf of the Petitioner

Date: May 24, 2025

/s/ Kerry E. Doyle
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